Nass Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Kalum Forest District
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This is a summary of the public input received on the Timber Supply Review in the Nass Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Nass Timber Supply Area

Background

As part of the review of timber supply in the Nass Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Nass Timber Supply Area *Data Package* and *Information Report* in May 2000. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Nass TSA. A 30-day review period, ending June 5, 2000, was provided for the public to comment on these documents.

On June 14, 2001, the British Columbia Forest Service released the *2001 Nass Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 45-day review period that ended July 30, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the Nass TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Kalum Forest District office.

Public Review Process and Response

Kalum District staff actively solicited public input on the Timber Supply Review in the Nass TSA through the following actions:

- copies of the *Data Package, Information Report, Analysis Report* and *Public Discussion Paper* were mailed to 16 stakeholders, including First Nations, licensees, local governments and local interest groups. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at the Kalum district office in Terrace, the Kalum field office in Stewart, and the Prince Rupert regional office in Smithers.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. Interviews were conducted with the local newspaper.
- presentations to the Kalum TSA Steering Committee (eight participants) and the District of Stewart (five participants) were made on May 8, 2000.
- a presentation to the Regional District of Kitimat/Stikine (three participants) was made on June 24, 2000.
- referrals were made to the Ministry of Forests website where documents were available to download.

The Kalum Forest District received two written submissions on the *Data Package* and four submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Nass TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report
- Other comments

Data Package

Land Base Factors

The submission from Skeena Cellulose Inc. says that reducing the timber harvesting land

base (THLB) limits the opportunity to address the severe decadence problem in the TSA when markets are favourable. The company also requests a review of cable operability, expressing the opinion that this will reveal that conventional harvesting has extended significantly into areas designated for cable harvesting. Skeena Cellulose also asks to know the basis for the estimation that 20 percent of cable terrain is being isolated by the use of backhoes.

The submission from the Mayor of the District of Stewart says the extended lull in the pulp market has clouded the issue of marginal wood, noting that pulp prices are currently high and expected to remain that way for two to three years. The mayor's submission says reducing the size of forest licences reduces the ability of licensees to be flexible. As volume decreases, so does potential for profit and without profit there is no hope of funding access to marginal wood, according to this submission. The mayor says a blending of marginal wood and close wood is a formula for stability and that removing marginal wood from the operable land base means fewer, more intermittent jobs based on pulp price alone.

Upper Nass Zone
Skeena Cellulose says the lack of activity in the Upper Nass is due to poor markets, expensive access and haul costs, and the fact no operating areas have been allocated. The company says if the government doesn't accept industry recommendations, the Upper Nass may not be accessed over the next five years, unless the market improves significantly.

In this submission, Skeena Cellulose says the Upper Nass zone could be removed from the timber harvesting land base temporarily, but expresses two concerns:

- this would limit the opportunity to catch up on past undercuts and replace decadent and pest-damaged stands with thrifty, vigorous forests if favourable markets return, and,
- it could be difficult to return the area to the THLB, given the political climate in relation to environmental interest groups.

Instead of a land base reduction, the company suggests reducing the AAC by taking a liberal projection of the impacts to merchantable timber volumes from prevalent pest agents, or partition the cut between the Upper Nass and the rest of the TSA. The company notes that allocation of operating areas would remain a significant issue in the second option.

Cut Control Requirements
Skeena Cellulose says there should be a relaxation of cut control requirements given the dependence of the harvest on favourable market conditions. A flexible cut control strategy is needed that would allow the full utilization of favourable market conditions to remove stands that are in a steady declining state of annual growth, according to the company.

Cable Harvest Partition
Skeena Cellulose says if the AAC is partitioned between cable and conventional harvest systems, it must be done by individual licence areas taking into consideration factors such as terrain and timber quality as well as economic factors such as distance from markets. The company says it doesn't believe this type of analysis has been conducted.

Timber Supply Area Analysis Report

Upper Nass Zone
West Fraser Mills expresses the opinion that it's not advisable or practical to change the size of the operable land base and harvest levels on the basis of short-term economics. The company recommends partitioning the AAC into an Upper and Lower Nass AAC, with no minimum cut control limits on the Upper Nass portion. This would meet Ministry of Forests' concern about overcutting in the Lower Nass and satisfy industry concerns about reduction of tenure rights, according to West Fraser.

The submission from the Regional District of Kitimat-Stikine says the decision to remove the Upper Nass zone is reasonable, provided this decision is reviewed with each subsequent timber supply review. The regional district says harvesting could become viable given provincial government policies permitting log exports, or government assistance with road construction or other employment development programs.

Deciduous Forests
The submission from the regional district says that although deciduous species are in limited supply in this TSA, policies to utilize these alternative woods should be encouraged.

Socio-Economic Factors
Skeena Cellulose says that the cyclical nature of the pulp market creates a very unstable economic climate and is especially difficult for communities that depend on the forest industry for their economic survival. Since licensees depend significantly on the pulp market, it is important they be able to take advantage of harvest opportunities during peak pulp markets.

Other Comments

Several submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Management Practices
The regional district's submission notes that the *Rural Land Use Bylaw* in the Meziadin area may impact forestry programs there, and says that any land and resource management strategy must consider high recreation values and quality sites for mushroom harvesting.

Harvest Levels
Five submissions comment on the harvest level to be determined by the chief forester.

The submission from the Regional District of Kitimat-Stikine says it is apparent than an AAC reduction is supportable and that a harvest rate of 1.14 million cubic metres per year could not be continued over any long term. One submission from Skeena-Cellulose says that instead of reducing the land base, an option is to reduce the AAC by allowing for a liberal projection of losses to pests.

Four of the five submissions express concern about a reduction in the AAC as a result of the removal of the Upper Nass zone. The following reasons are provided:

- a determination that maximizes the timber to be harvested would allow the removal of stands that are steadily declining, replacing them with thrifty, vigorous trees.
- the reduction will decrease the viability of future developments. Due to poor quality wood, the only way to be sustainable is through large volumes, thereby reducing overall costs.
- it would be based on short-term economics (recent poor markets).
- it would be unfair to licensees who have purchased licences and made business decisions on the basis of certain levels of cutting rights, which might not be returned to them if/when it became economical to harvest in the Upper Nass.

The following alternatives are suggested:

- partition the cut between the Upper Nass and the rest of the TSA.
- partition the Upper Nass with no cut control requirements.
- create three partitions: operable land base, Upper Nass and cable area. Only the operable land base would have an AAC and cut control as per current regulations, while periodic volumes would be determined for the problem areas. This approach would help stabilize a core operating area, while enabling licensees to take advantage of additional harvest opportunities during peak pulp markets.

Appendix 1

Submissions received by the Kalum Forest District

Submissions received on the Data Package

Forest industry
Skeena Cellulose Inc., Terrace Woodlands Operations

Local government
District of Stewart, Mayor

Submissions received on the Timber Supply Analysis Report

Forest industry
West Fraser Mills Ltd., Chief Forester
Skeena Cellulose Inc., Forest Resources Manager

Local government
District of Stewart, Mayor
Regional District of Kitimat-Stikine, Manager, Development Services